

# ***EXHIBIT A***

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JPMORGAN CHASE BANK,  
N.A.,

Plaintiff,

v.

TIMIPAH IKEMI,

Defendant.

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Civil Action No. 4:24-cv-04140

**DECLARATION IN SUPPORT OF PLAINTIFF'S**  
**REQUEST FOR ENTRY OF DEFAULT**

Pursuant to 28 U.S.C. 1746, I, Christina M. Carroll, declare as follows:

1. I am an attorney and shareholder at Greenberg Traurig, LLP licensed to practice law in the State of Texas and before this Court. I am the attorney-in-charge for Plaintiff JPMorgan Chase Bank, N.A. ("**Chase**") in this civil action, and I submit this Declaration in support of Plaintiff's *Request for Entry of Default* against Defendant Timipah Ikemi ("**Defendant**"). I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify thereto.

2. Defendant is not a minor or incompetent person, nor is he in active military service.

3. Defendant has not filed an answer or otherwise responded to this lawsuit. Neither Defendant nor any counsel representing Defendant has contacted counsel of record.

4. Copies of this Declaration and Chase's Request for Entry of Default are being served upon Defendant by U.S. certified mail, return receipt requested.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on January 28, 2025, in Dallas, Texas.

/s/ Christina M. Carroll  
Christina M. Carroll